

CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C.  
JAMES E. CECCHI  
KEVIN G. COOPER  
5 Becker Farm Road  
Roseland, NJ 07068  
Telephone: 973/994-1700  
973/994-1744 (fax)  
jcecchi@carellabyrne.com  
kcooper@carellabyrne.com

Local Counsel for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

BARBARA STROUGO, Individually	)	No. 3:20-cv-10100-RK (TJB)
and on Behalf of All Others Similarly	)	
Situated,	)	<u>CLASS ACTION</u>
	)	
Plaintiff,	)	UNOPPOSED MOTION FOR
	)	PRELIMINARY APPROVAL OF
vs.	)	CLASS ACTION SETTLEMENT
	)	AND APPROVAL OF NOTICE TO
MALLINCKRODT PUBLIC LIMITED	)	THE CLASS
COMPANY, et al.,	)	
	)	
Defendants.	)	Motion Return Date: October 21, 2024
	)	

---

TO: ALL COUNSEL OF RECORD:

**PLEASE TAKE NOTICE** on October 21, 2024, Plaintiffs, by and through their counsel, shall move before the Honorable Robert Kirsch, U.S.D.J., at the United States District Court for the District of New Jersey, in Courtroom 4E located at Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order preliminarily approving the proposed Stipulation of Settlement (the “Stipulation”).

By this motion, Plaintiffs respectfully move the Court for an Order:

1. Preliminarily approving the settlement set forth in the Stipulation (the “Settlement”);
2. Approving the proposed forms of notice and the notice plan, and directing that notices be disseminated pursuant to this plan; and
3. Setting a Settlement Hearing and certain other dates in connection with the final approval of the Settlement.

In support thereof, Plaintiffs rely on the accompanying: (1) Plaintiffs’ Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement and Approval of Notice to the Class; (2) the Capeci Decl. and exhibits thereto; (3) the Stipulation; (4) all other pleadings and matters of record; and (5) such additional evidence or argument as may be presented before or at the hearing.

DATED: September 18, 2024

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C.  
JAMES E. CECCHI  
KEVIN G. COOPER

---

/s/James E. Cecchi  
JAMES E. CECCHI

5 Becker Farm Road  
Roseland, NJ 07068  
Telephone: 973/994-1700  
973/994-1744 (fax)  
jcecchi@carellabyrne.com  
kcooper@carellabyrne.com

*Local Counsel for Plaintiffs*

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
MICHAEL G. CAPECI  
AVITAL O. MALINA  
NATALIE C. BONO  
58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)  
srudman@rgrdlaw.com  
drosefeld@rgrdlaw.com  
mcapeci@rgrdlaw.com  
amalina@carellabyrne.com  
nbono@rgrdlaw.com

*Lead Counsel for Plaintiffs*

LORIUM LAW PLLC  
RONALD J. COHEN  
RICHELLE B. LEVY  
101 NE 3rd Avenue, Suite  
1800 Fort Lauderdale, FL 33301  
Telephone: 954/462-8000  
rcohen@loriumlaw.com  
rlevy@loriumlaw.com

*Additional Counsel for Named Plaintiff  
Sunrise*